

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Victoria McIntosh	:	Chapter 13
	:	No.: 16-18098-ELF
Debtor(s)	:	

OBJECTION TO CERTIFICATE OF DEFAULT

Debtor, Victoria McIntosh, by and through their undersigned Counsel, Brad J. Sadek, hereby objects to SN Servicing Corporation's (Movant) Certificate of Default on the following basis:

The debtor avers that she was not made aware of the change of her mortgage servicer from Caliber Home Loans to SN Servicing Corporation and as a result of the same, the payments she submitted were sent to Caliber Home Loans. The debtor will provide proof of all payments made to date.

WHEREFORE, Debtor respectfully requests this Honorable Court to DENY Movant's request for relief.

Respectfully submitted,

Dated: February 22, 2021

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
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